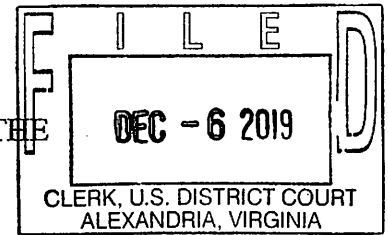


IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division



UNITED STATES OF AMERICA

v.

LIEN KIM THI PHAN,
a/k/a NANCY PHAN;

HON LAM LUK;

DUONG THUY NGUYEN,
a/k/a EVE NGUYEN

Defendants.

Case No. 1:19-mj-515

UNDER SEAL

**AFFIDAVIT IN SUPPORT OF
A CRIMINAL COMPLAINT AND ARREST WARRANTS**

I, Donald August Mockenhaupt, being duly sworn, depose and state as follows:

Agent Background

1. I am a duly appointed Special Agent of the Federal Bureau of Investigation ("FBI") and have been employed as such since February 2002. I am currently assigned to the Washington (D.C.) Field Office, Northern Virginia Resident Agency. I am on a squad that investigates darknet related narcotics trafficking and I have been assigned to this squad since February 2019. Since August 2004, the vast majority of my investigative assignments have been narcotics related cases.

2. As a FBI Special Agent, I have received extensive training in the enforcement of the criminal laws of the United States, as well as extensive training in criminal investigations. I have also participated in numerous investigations involving unlawful narcotics distribution.

During my participation in these investigations, I have been involved in the application for and execution of many arrest and search warrants for narcotics related offenses, resulting in the prosecution and conviction of numerous individuals and the seizure of illegal drugs, illegal drug proceeds, and other evidence of criminal activity. As a narcotics investigator, I have interviewed many individuals involved in drug trafficking and have obtained information from them regarding the acquisition, sale, importation, manufacture, and distribution of controlled substances. Through my training and experience, I am familiar with the actions, habits, traits, methods, and terminology utilized by traffickers of controlled dangerous substances.

3. I am submitting this affidavit in support of arrest warrants and a criminal complaint charging the defendants, LIEN KIM THI PHAN, a/k/a NANCY PHAN; HON LAM LUK; and DUONG THUY NGUYEN, a/k/a EVE NGUYEN, with conspiracy to distribute 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 846.

4. This affidavit does not contain every fact known to me regarding this investigation, but rather contains information necessary to demonstrate probable cause in support of the above-referenced criminal complaint and arrest warrants. All information contained in this affidavit is either personally known to me, has been related to me by other law enforcement officers, or has been related to me through reports, records or documents gathered during this investigation.

Initiation of Investigation

5. The United States, including the FBI, the U.S. Postal Inspection Service ("USPIS"), the Fairfax County Police Department, the Drug Enforcement Administration, and

the Food and Drug Administration Office of Criminal Investigations, is conducting a criminal investigation of a darknet market ("DM") vendor that operates using the moniker "addy4cheap." A DM is a hidden commercial website that operates on a portion of the Internet that is often referred to as the TOR network, darkweb, or darknet. A DM operates as a black market, selling or brokering transactions involving legal products as well as drugs, weapons, counterfeit currency, stolen credit card details, forged documents, unlicensed pharmaceuticals, steroids, and other illicit goods.

6. In August 2019, Darknet Opioid Task Force FBI agents interviewed an individual residing in Fairfax County, Virginia within the Eastern District of Virginia who was suspected of being a darknet drug recipient. The individual is referred to herein in the masculine, regardless of true gender. The individual stated that he had on multiple occasions purchased Adderall through a DM known as the Empire Market from a vendor using the moniker addy4cheap. He did not think that the pills that he received were pharmaceutical grade as he had a prescription for Adderall and the tablets from addy4cheap were different from those that he had been prescribed. The individual stated that he received the tablets via U.S. Mail and that the return address on the packages from addy4cheap was in Fairfax, Virginia. The individual provided agents with the tracking number from his most recent purchase from addy4cheap on the Empire Market.

7. A review of U.S. Postal Service ("USPS") business records indicated that the aforementioned individual had received three packages that were consistent with his description of the packages that he stated he had received from addy4cheap. All three parcels were shipped via USPS First Class Mail, contained tracking numbers, and bore the sender name "TXPRESS" with a return address in Fairfax County, Virginia. The records also indicated that at least one of

the packages mailed to the individual was deposited at an external blue USPS collection box at the Chantilly Post Office in Chantilly, Virginia (hereinafter referred to as the "Chantilly Collection Box"), located within the Eastern District of Virginia.

Addy4cheap's Vendor Accounts

8. During the course of this investigation, investigators reviewed darknet marketplaces and observed vendor accounts with the moniker addy4cheap offering drugs for sale on the Empire Market and Cryptonia. On both of these DMs, the vendor using the addy4cheap moniker advertised the sale of Adderall. Addy4cheap offered Adderall for sale on the Empire Market and Cryptonia for quantities ranging from one to over 1000 tablets. The price for one tablet was listed at \$12 with the price per tablet decreasing if you purchase more. Addy4cheap scaled the prices such that the price per tablet is \$8 if you purchase 1,000 tablets or more.

9. Customers on the Empire Market have the ability, but are not required, to leave a review of any product that they purchase on the relevant vendor's profile. As of December 4, 2019, the vendor using the moniker addy4cheap on the Empire Market had 2,558 reviews which consisted of 2,512 positive reviews, 25 neutral reviews, and 21 negative reviews. As an investigator, this indicates to me that the vendor using the addy4cheap moniker has fulfilled at least 2,558 orders through the Empire Market. It is noted that the Empire Market lists addy4cheap as becoming a member of the DM on May 24, 2019. Therefore, between May 24, 2019 and December 4, 2019, addy4cheap appears to have executed at least 2,558 reviewed transactions. I suspect that the actual number of transactions for the sale of illegal narcotics by addy4cheap on the Empire Market exceeds 2,558 because customers are not required to leave a review. I also observed several negative reviews left for the vendor addy4cheap on the Empire Market. Some examples of the negative reviews are as follows: (1) "Tested positive for meth

with simon a/b test”, (2) “Not Adderall. Pressed pills. Tested positive for meth”, (3) “Dishonest vendor. Says its authentic adderall and sends meth and sugar pressed into an “adderall” shape. Took this to study and ended up not sleeping for two days. It sucked. Do not buy”, and (4) “I tested the pills and they contain Meth. I was pretty upset since he advertised them as 100% authentic. I messaged him and he said the most he could offer me was a 15% discount. Just beware buyer these are Meth pills!”

10. On November 7, 2019, I reviewed the addy4cheap vendor profile on Cryptonia. The profile indicated that addy4cheap had conducted 140 transactions and has been a member of the DM since June 29, 2019. I also reviewed the language in the terms and conditions and the refunds and dispute sections of the addy4cheap profile. That language was identical on addy4cheap’s profile on both the Empire Market and Cryptonia.

Undercover Drug Purchases From Addy4cheap

11. Beginning in late August 2019, investigators began to conduct undercover drug purchases from addy4cheap via the Empire Market. Later in the investigation, investigators made undercover purchases from addy4cheap on Cryptonia as well. To initiate the transactions, the investigators logged into their undercover account on the Empire Market or Cryptonia and placed their orders with addy4cheap. The undercover investigators paid for the suspected narcotics with cryptocurrency obtained with official government funds. The suspected narcotics were then sent to the investigators via First Class Mail and the tablets were received several days after the undercover investigator ordered them. The below table lists the undercover purchases from addy4cheap. The table denotes the following: (1) the date that the undercover purchase was initiated, (2) the DM utilized by the undercover investigators, (3) the number of tablets ordered in that specific transaction, (4) the address of the general area of where the undercover

investigator designated the drugs to be shipped to and (5) the return name on the envelope. The return name is also commonly referred to as the sender's name.

Date Ordered	DM	Number of Tablets	Location Mailed To	Return Name on Envelope
8/24/2019	Empire	11	Fairfax County, VA	TXPRESS
8/28/2019	Empire	20	Prince William County, VA	TXPRESS
9/1/2019	Empire	10	Fairfax County, VA	TRX Express
9/5/2019	Empire	16	Prince William County, VA	TRX Express
9/12/2019	Cryptonia	20	Loudoun County, VA	TRX Express
9/23/2019	Cryptonia	40	Loudoun County, VA	SMART BARGAIN
9/24/2019	Empire	10	Fairfax County, VA	TRX Express
9/30/2019	Empire	20	Prince William County, VA	TRX Express
10/1/2019	Cryptonia	20	Providence, RI	TRX Express
N/A ¹	Cryptonia	20	Providence, RI	TRX Express
10/9/2019	Empire	30	Anne Arundel County, MD	JUNGLE CO
10/15/2019	Empire	200	Prince William County, VA	RAISON EXPRESS
10/21/2019	Cryptonia	20	Providence, RI	RAISON EXPRESS
10/22/2019	Cryptonia	20	Loudoun County, VA	RAISON EXPRESS
10/29/2019	Cryptonia	100	Loudoun County, VA	RAISON EXPRESS
11/5/2019	Empire	Ordered 20, Received 24	Prince William County, VA	RAISON EXPRESS

¹ It is noted that there is no ordered date listed for one of the undercover drug purchases. The undercover investigator ordered 20 tablets on October 1, 2019 and asked for the tablets to be mailed to a Providence, Rhode Island address. The shipment arrived and a second package was mailed shortly thereafter with the same quantity of tablets. Investigators believe that this was a mistake made by addy4cheap because there was no payment for this second package.

Date Ordered	DM	Number of Tablets	Location Mailed To	Return Name on Envelope
11/6/2019	Cryptonia	20	Prince William County, VA	RAISON EXPRESS
11/12/2019	Cryptonia	20	Prince William County, VA	RAISON EXPRESS
11/19/2019	Empire	100	Prince William County, VA	RAISON EXPRESS
11/21/2019	Empire	19	Prince William County, VA	RAISON EXPRESS

12. All of the aforementioned tablets received from addy4cheap are peach in color and resemble those advertised on addy4cheap's vendor pages on the Empire Market and Cryptonia. Consistent with the advertisements by addy4cheap on the Empire Market and Cryptonia, upon visual inspection, investigators observed markings on the tablets of "A D" and "30" which is consistent with known markings for 30 milligram Adderall tablets, however, the purchased tablets appeared to be pressed. Tablets that are pressed are not produced by pharmaceutical companies, rather they are produced by black market drug traffickers.

13. All of the aforementioned tablets were shipped in padded envelopes via U.S. Mail, the method of shipment available through addy4cheap. The padded envelopes were manila or light gray. The return names and addresses on the packages changed throughout the investigation, but all of the return addresses were locations in Fairfax County, Virginia. Most of the packages contained one or two folded pieces of paper and a sealed black foil bag. Within the black foil bag was a clear re-sealable bag which contained the tablets. Three of the packages from "RAISON EXPRESS" contained empty raisin boxes where the tablets were inside clear re-sealable bags within raisin boxes. I know that individuals involved in selling drugs via the darknet try to disguise their drug shipments in order to avoid detection by law enforcement.

14. Some of the tablets ordered on August 24, 2019 were subsequently analyzed at the Commonwealth of Virginia Department of Forensic Science and it was determined that the tablets contained methamphetamine, a Schedule II controlled substance. The remaining tablets are pending laboratory analysis. Tablets ordered on September 12, 2019 and October 29, 2019, field tested positive for the presence of methamphetamine. Investigators weighed the tablets upon receipt and each individual tablet received through the undercover buys weighed approximately 0.35 grams. The total number of tablets obtained from undercover purchases was 740 for an estimated total of 259 grams.

15. The controlled purchases described above involving the addy4cheap moniker were conducted using Bitcoin, a type of digital cryptocurrency. Functionally, it serves the same purpose as United States dollars, except that it is not tied to a central bank and is not regulated by a government body such as a treasury. Bitcoin transactions take place entirely online and offer a degree of anonymity to users. Bitcoin transactions are securely recorded in a public ledger called a blockchain. Based on my training and experience, individuals who are involved in criminal activity over the darkweb often purchase items in Bitcoin to conceal the true nature of the funds from law enforcement.

Surveillance of LIEN KIM THI PHAN

16. On August 28, 2019, a surveillance camera recorded a white Scion as it approached the Chantilly Collection Box at the Chantilly Post Office and I have reviewed the video recording. The recording shows the white Scion park next to the Chantilly Collection Box and the driver's side front door opened slightly. The driver then placed multiple manila envelopes into the Chantilly Collection Box. I could not observe who operated the vehicle. The vehicle then departed from the post office. I queried the Virginia Department of Motor Vehicles

("DMV") records for the license plate on the white Scion and observed that it is registered to Tyler PHAM at a residence in the 13000 block of Pennypacker Lane in Fairfax, Virginia (hereinafter referred to as the "Pennypacker Lane residence"). Further investigation has revealed that Tyler PHAM and LIEN KIM THI PHAN are likely husband and wife and live together at the Pennypacker Lane residence.

17. On August 30, 2019, law enforcement identified a USPS Priority Mail parcel shipped from Plano, Texas scheduled for delivery at the Pennypacker Lane residence on August 31, 2019. The parcel contained a handwritten label addressed to "HoN LUCK"² with a return address of Garland, Texas. Further analysis of USPS records for previous mailings to the Pennypacker Lane residence from Texas between April 11, 2019 and August 21, 2019 revealed 17 total parcels sent, nine of which were addressed to "Hon Luck."

18. On September 3, 2019, investigators conducted physical surveillance in the vicinity of the Pennypacker Lane residence. The white Scion was observed parked in the driveway as was a gray Honda Pilot. Based on Virginia DMV records at that time, the Honda was registered to LIEN KIM THI PHAN at the Pennypacker Lane residence.

19. On September 3, 2019, investigators observed LIEN KIM THI PHAN depart the Pennypacker Lane residence in the white Scion. Surveillance units followed LIEN KIM THI PHAN to the Greenbriar Town Center located a short distance from the residence. LIEN KIM THI PHAN exited the white Scion and she carried a bag to a USPS collection box located in front of some retail shops (hereinafter referred to as the "Greenbriar Collection Box"). LIEN KIM THI PHAN then took multiple manila envelopes out of the bag and deposited them into the

² This spelling is how the name appeared on the label as written.

Greenbriar Collection Box. LIEN KIM THI PHAN was then followed to the aforementioned Chantilly Post Office where she deposited additional manila envelopes with white labels into the blue Chantilly Collection Box.

20. On September 3, 2019, a U.S. Postal Inspector reviewed USPS records for 40 packages that had been deposited into the Greenbriar Collection Box and the Chantilly Collection Box. The 40 packages were all in the same type of padded manila envelopes and they all had the same return address information. The name listed on the return address was "TXPRESS" and the address was a location in Fairfax County, Virginia. Therefore, I believe that the 40 packages reviewed by USPIS were likely the same manila envelopes that investigators observed LIEN KIM THI PHAN deposit into the Greenbriar Collection Box and the Chantilly Collection Box earlier on September 3, 2019.

21. On September 11, 2019, investigators conducted physical surveillance in the vicinity of the Pennypacker Lane residence. The white Scion was observed parked in the driveway along with the Honda Pilot. Shortly thereafter, investigators followed the white Scion operated by LIEN KIM THI PHAN from Pennypacker Lane to the Greenbriar Town Center located a short distance away. LIEN KIM THI PHAN carried a bag to the Greenbriar Collection Box located in front of some retail shops. LIEN KIM THI PHAN then took multiple manila envelopes with white labels out of the bag and deposited them into the Greenbriar Collection Box. Approximately 12 minutes later, LIEN KIM THI PHAN was observed at the Chantilly Post Office where she deposited additional manila envelopes with white labels into the Chantilly Collection Box.

22. On September 11, 2019, a U.S. Postal Service Inspector reviewed USPS records for 17 packages that had been deposited into the Greenbriar Collection Box and 24 packages that

had been deposited into the Chantilly Collection Box. The 41 packages were all in the same type of padded manila envelopes and they all had the same return address information. The name on the return address was "TRX EXPRESS" and the address was a location in Fairfax County, Virginia. Therefore, I believe that the 41 packages reviewed by USPS were likely the same manila envelopes that LIEN KIM THI PHAN deposited into the Greenbriar Collection Box and the Chantilly Collection Box earlier on September 11, 2019.

23. Additionally on September 11, 2019, a U.S. Postal Inspector reviewed USPS records for 13 padded manila packages that bore a return name of "TRX EXPRESS" and a Fairfax County, Virginia return address. These 13 packages had been deposited in a USPS collection box in Loudoun County, Virginia. The parcel characteristics for these 13 packages were the exact same as those retrieved from the Greenbriar Collection Box and the Chantilly Collection Box.

24. On September 17, 2019, investigators observed the white Scion and the Honda Pilot parked in the driveway of the Pennypacker Lane residence. Later on that day, investigators observed the white Scion arrive in the parking lot in the vicinity of the Greenbriar Collection Box in the Greenbriar Town Center. Investigators observed LIEN KIM THI PHAN deposit multiple manila envelopes into the blue Greenbriar Collection Box. Shortly thereafter, the white Scion was observed at the Chantilly Post Office. Investigators observed LIEN KIM THI PHAN deposit several manila envelopes with white labels into the Chantilly Collection Box. Shortly thereafter, the white Scion was observed at Lafayette Center Drive in Fairfax County in the vicinity of a USPS collection box (referred to hereinafter as the "Lafayette Center Drive Collection Box"). Investigators observed LIEN KIM THI PHAN approach the collection box and deposit additional manila envelopes with white labels. In total, LIEN KIM THI PHAN was

observed depositing manila envelopes at three different collection boxes within approximately one hour and six minutes.

25. Additionally on September 17, 2019, a U.S. Postal Inspector reviewed USPS records for 80 padded manila packages that bore a return name of "TRX EXPRESS" and a Fairfax County, Virginia return address. The records for the 80 packages indicated that they were deposited into the three aforementioned USPS collection boxes that LIEN KIM THI PHAN was observed depositing manila envelopes into on September 17, 2019 along with an additional USPS collection box in Fairfax County, Virginia. Investigators did not observe LIEN KIM THI PHAN deposit packages into the additional collection box in Fairfax County. Therefore, I believe that the packages reviewed by USPIS were likely the same manila envelopes that investigators observed LIEN KIM THI PHAN deposit into three collection boxes earlier on September 17, 2019 plus another quantity deposited at the additional collection box where no physical observations were made.

26. On September 19, 2019, investigators observed the white Scion travel from the Pennypacker Lane residence to a shopping plaza in Loudoun County, Virginia. Investigators observed LIEN KIM THI PHAN deposit multiple manila envelopes into a blue USPS collection box (referred to hereinafter as the "Loudoun County Collection Box").

27. Additionally on September 19, 2019, a U.S. Postal Inspector reviewed USPS records for 57 padded manila packages that bore a return name of "TRX EXPRESS" and a Fairfax County, Virginia return address. These records were for packages that had been deposited in the aforementioned USPS collection box in Loudoun County that LIEN KIM THI PHAN was observed depositing manila envelopes into on September 19, 2019 along with an additional amount at the Chantilly Post Office. Specifically, the records indicate that 20

packages were deposited into the Loudoun County Collection Box and 37 packages were deposited into the Chantilly Collection Box. Investigators reviewed a video surveillance recording stationed at the Chantilly Post Office. The recording showed the gray Honda Pilot arrive at the Chantilly Post Office at approximately 4:11 p.m. and the driver deposited multiple manila envelopes into the Chantilly Collection Box. Therefore, I believe that the 20 packages reviewed by USPIS were likely the same manila envelopes that investigators observed LIEN KIM THI PHAN deposit into the collection box in Loudoun County and an unknown individual deposited the 37 packages into the Chantilly Collection Box.

28. During the early morning hours of September 23, 2019, a GPS tracking device was installed on the white Scion pursuant to a tracking warrant issued by United States Magistrate Judge Theresa Carroll Buchanan on September 20, 2019. The tracking device was removed on November 1, 2019.

29. On September 24, 2019, investigators conducted physical surveillance in the vicinity of the Pennypacker Lane residence. The white Scion was observed parked in the driveway along with the Honda Pilot. Later in the morning, the white Scion traveled to the Lafayette Center Drive Collection Box in Fairfax County. LIEN KIM THI PHAN was observed carrying a yellow and blue bag up to the collection box into which she deposited multiple manila envelopes with white labels. Approximately ten minutes later, LIEN KIM THI PHAN was observed at a USPS Collection Box in Loudoun County, Virginia. LIEN KIM THI PHAN carried the same yellow and blue bag up to that collection box and she deposited multiple manila envelopes with white labels.

30. Additionally on September 24, 2019, a U.S. Postal Inspector reviewed USPS records for 39 padded manila packages that bore a return name of "TRX EXPRESS" and a

Fairfax County, Virginia return address that had been deposited in the two aforementioned USPS collection boxes that LIEN KIM THI PHAN was observed depositing manila envelopes into on September 24, 2019. Specifically, there were 18 deposited at the Lafayette Center Drive Collection Box and 21 at the collection box in Loudoun County, Virginia. Therefore, I believe that the 39 packages reviewed by USPIS were likely the same manila envelopes that investigators observed LIEN KIM THI PHAN deposit into collection boxes earlier on September 24, 2019.

31. During the evening hours of September 24, 2019, investigators spoke with a law enforcement team assigned to Ronald Reagan Washington National Airport. As part of passenger screening, it was discovered that Tyler PHAM, who lives at the Pennypacker Lane residence with LIEN KIM THI PHAN, was carrying over \$30,000 in U.S. Currency. A drug detecting K-9 alerted to the money carried by PHAM and the money was seized by law enforcement.

32. I reviewed the data collected from the GPS device that was installed on the white Scion for the early morning hours of September 26, 2019. I observed that the white Scion traveled shortly after 3:00 AM to the vicinity of a residence in the 13000 block of Tabscott Drive in Chantilly, Virginia (hereinafter referred to as the "Tabscott Drive residence") where HON LAM LUK and DUONG THUY NGUYEN reside. The data indicated that the white Scion was in the vicinity of the residence for less than ten minutes before the white Scion returned to the immediate vicinity of the Pennypacker Lane address.

Surveillance of HON LAM LUK

33. I reviewed airline records from Korean Air pertaining to HON LAM LUK. The records indicated that HON LAM LUK departed the U.S. on August 26, 2019 for Vietnam and he arrived back in the U.S. on September 19, 2019.

34. On September 26, 2019, the same day that the white Scion traveled shortly after 3:00 AM to the area near the Tabscott Drive residence for less than ten minutes before returning to the immediate vicinity of the Pennypacker Lane address, investigators reviewed video surveillance recordings from the area near the Chantilly Collection Box. At approximately 10:19 AM, investigators observed a gray Mercedes Benz park alongside the Chantilly Collection Box into which the driver deposited numerous manila envelopes. Investigators queried the license plate of the Mercedes Benz with the Virginia Department of Motor Vehicles and observed that it is registered to HON LAM LUK and an individual believed to be his father at the Tabscott Drive residence.

35. On September 27, 2019, investigators observed the gray Mercedes Benz drive past the Chantilly Post Office and disappear from view. Several minutes later, the gray Mercedes Benz pulled alongside the Chantilly Collection Box and deposited multiple manila envelopes. The driver of the gray Mercedes Benz was identified as HON LAM LUK, one of the registered owners of the vehicle. A USPS clerk emptied the box shortly thereafter and investigators observed 19 manila padded envelopes in the box with the sender name of "TRX EXPRESS" and a return address in Fairfax County, Virginia. Additionally, one of the 19 packages was intended for the undercover investigator who had placed an order on September 24, 2019 with addy4cheap as detailed in the table above.

36. On September 30, 2019, investigators observed the gray Mercedes Benz drive past the Chantilly Post Office and disappear from view. Several minutes later, the gray Mercedes Benz pulled alongside the Chantilly Collection Box and HON LAM LUK deposited multiple manila envelopes into the Chantilly Collection Box.

37. Additionally on September 30, 2019, a U.S. Postal Inspector reviewed USPS records for 25 padded manila packages that bore a return name of "TRX EXPRESS" and a Fairfax County, Virginia return address. These 25 packages had been deposited in the Chantilly Collection Box on September 30, 2019, which is the same Chantilly Collection Box where investigators observed HON LAM LUK deposit manila envelopes on September 30, 2019. Therefore, I believe that the 25 packages reviewed by USPIS were likely the same manila envelopes that investigators observed HON LAM LUK deposit earlier on September 30, 2019.

38. On October 2, 2019, investigators observed the gray Mercedes Benz depart from the Tabscott Drive residence. Shortly thereafter, the gray Mercedes Benz pulled alongside the Chantilly Collection Box and HON LAM LUK deposited multiple manila envelopes.

39. Additionally on October 2, 2019, a U.S. Postal Inspector reviewed USPS records for 28 padded manila packages that bore a return name of "TRX EXPRESS" and a Fairfax County, Virginia return address. These 28 packages had been deposited in the Chantilly Collection Box on October 2, 2019, which is the same Chantilly Collection Box where investigators observed HON LAM LUK deposit manila envelopes on October 2, 2019. Therefore, I believe that the 28 packages reviewed by USPIS were likely the same manila envelopes that investigators observed HON LAM LUK deposit earlier on October 2, 2019.

40. On October 4, 2019, investigators observed the gray Mercedes Benz depart from the Tabscott Drive residence and investigators followed the gray Mercedes Benz. Shortly

thereafter, the gray Mercedes Benz pulled alongside the Chantilly Collection Box and HON LAM LUK deposited multiple manila envelopes.

41. Additionally on October 4, 2019, a U.S. Postal Inspector reviewed USPS records for 12 padded manila packages that bore a return name of "TRX EXPRESS" and a Fairfax County, Virginia return address. These 12 packages had been deposited in the Chantilly Collection Box on October 4, 2019, which is the same Chantilly Collection Box where investigators observed HON LAM LUK deposit manila envelopes on October 4, 2019. Therefore, I believe that the 12 packages reviewed by USPIS were likely the same manila envelopes that investigators observed HON LAM LUK deposit earlier on October 4, 2019.

42. On October 7, 2019, investigators observed the gray Mercedes Benz depart from the Tabscott Drive residence. Shortly thereafter, the gray Mercedes Benz pulled alongside the Chantilly Collection Box and HON LAM LUK appeared to deposit multiple manila envelopes with white labels into the Chantilly Collection Box. It appeared to investigators that HON LAM LUK had difficulty depositing items as it appeared that the collection box was full. An investigator observed additional USPS customers have the same issue when they tried to deposit their mail.

43. Additionally on October 7, 2019, a U.S. Postal Inspector reviewed USPS records for one padded manila package that bore a return name of "TRX EXPRESS" and a Fairfax County, Virginia return address. The package had been deposited in the Chantilly Collection Box on October 7, 2019, which is the same Chantilly Collection Box where investigators observed HON LAM LUK deposit manila envelopes on October 7, 2019. Therefore, I believe that the package reviewed by USPIS was likely the same manila envelope that investigators observed HON LAM LUK deposit earlier on October 4, 2019.

44. On October 8, 2019, investigators observed the gray Mercedes Benz parked at the Tabscott Drive residence. Shortly thereafter, the gray Mercedes Benz was observed driving toward the Chantilly Post Office. The gray Mercedes Benz then pulled alongside the Chantilly Collection Box and HON LAM LUK deposited multiple manila envelopes with white envelopes. Based on a review of surveillance photos, investigators believed that HON LAM LUK had some type of covering at the end of his left index finger. Investigators believe that HON LAM LUK utilized the covering in order to avoid leaving fingerprints on the envelopes.

45. Additionally on October 8, 2019, a U.S. Postal Inspector reviewed USPS records for 22 padded manila packages that bore a return name of "TRX EXPRESS" with a Fairfax County, Virginia return address. These 22 packages had been deposited into the Chantilly Collection Box on October 8, 2019, which is the same Chantilly Collection Box where investigators observed HON LAM LUK deposit manila envelopes on October 8, 2019. Therefore, I believe that the 22 packages reviewed by USPIS were likely the same manila envelopes that investigators observed HON LAM LUK deposit earlier on October 8, 2019.

46. During the late evening hours of October 15, 2019, a GPS tracking device was installed on the gray Mercedes Benz pursuant to a tracking warrant issued by United States Magistrate Judge Michael Nachmanoff on October 11, 2019.

47. I reviewed the data collected from the GPS device that was installed on the gray Mercedes Benz for October 17, 2019. At approximately 9:50 PM, the Mercedes Benz left the Tabscott Drive residence and was in the vicinity of the Pennypacker Lane residence until approximately 10:02 PM. The Mercedes Benz then proceeded to the Franklin Farm Shopping Center near a USPS collection box arriving at approximately 10:12 PM. That same evening, at

approximately 10:15 PM, HON LAM LUK was observed by an investigator driving the Mercedes Benz in the Franklin Farm Shopping Center.

48. On October 18, 2019, a U.S. Postal Inspector reviewed USPS records for 12 packages that were collected from the collection box at the Franklin Farm Shopping Center. All 12 of the parcels contained the sender name "RAISON EXPRESS" with a return address in Fairfax County, Virginia. Investigators believe that these 12 packages were likely deposited by HON LAM LUK when he was observed in the Franklin Farm Shopping Center in the late evening on October 17, 2019.

49. During the afternoon on October 18, 2019, investigators observed LIEN KIM THI PHAN, HON LAM LUK and DUONG THUY NGUYEN eat a meal together at a restaurant in Chantilly, Virginia.

50. I reviewed the data collected from the GPS device that was installed on the gray Mercedes Benz for October 22 and 23, 2019. On October 22, 2019, at approximately 5:43 PM, the Mercedes Benz arrived in the vicinity of the Pennypacker Lane residence. At approximately 9:14 PM, the Mercedes Benz departed the vicinity of the Pennypacker Lane residence and arrived in the vicinity of the USPS collection box at the Franklin Farm Shopping Center at approximately 9:28 PM. The Mercedes Benz then arrived in the vicinity of the Chantilly Post Office at approximately 9:38 PM. The Mercedes Benz then arrived in the vicinity of the Pennypacker Lane residence at approximately 9:48 PM. The Mercedes Benz departed from the vicinity of the Pennypacker Lane residence at approximately 12:18 AM on October 23, 2019 and it arrived in the vicinity of the Tabscott Drive residence at approximately 12:24 AM.

51. Additionally on October 23, 2019, a U.S. Postal Inspector reviewed USPS records for 48 packages that were collected from the collection boxes at the Chantilly Post Office, the

Greenbriar Town Center and the Franklin Farm Shopping Center. All 48 of the parcels contained the sender name "RAISON EXPRESS" with a return address in Fairfax County, Virginia.

52. I reviewed the data collected from the GPS device that was installed on the gray Mercedes Benz for October 24 and 25, 2019. At approximately 7:35 PM on October 24, 2019, the vehicle arrived in the vicinity of the Pennypacker Lane residence. At approximately 11:35 PM, the vehicle departed from the Pennypacker Lane residence and arrived in the vicinity of the Tabscott Drive residence at approximately 11:41 PM. At approximately 12:50 AM on October 25, 2019, the vehicle departed from the Tabscott Drive residence and arrived in the vicinity of the Post Office located on Westfields Boulevard in Centreville, Virginia at approximately 12:58 AM. The vehicle then arrived in the vicinity of the Chantilly Post Office at approximately 1:02 AM before it arrived in the vicinity of the Tabscott Drive residence at approximately 1:10 AM on October 25, 2019.

53. Additionally, during the morning of October 25, 2019, a U.S. Postal Inspector reviewed the items from the collection box at the Chantilly Post Office. The inspector observed that there were five USPS First Class parcels and all of them had the return name of "RAISON EXPRESS" and a return address in Fairfax County, Virginia.

54. On October 29, 2019, HON LAM LUK was observed at Washington Dulles Airport as he boarded a flight to Dubai, United Arab Emirates. Flight records indicated that HON LAM LUK then flew from Dubai to Vietnam.

55. On December 3, 2019, investigators received information from a government agency that HON LAM LUK had returned to the United States.

56. On December 4, 2019, investigators observed the gray Mercedes Benz parked at the Tabscott Drive residence. Approximately 41 minutes later, the gray Mercedes Benz pulled alongside the Chantilly Collection Box and HON LAM LUK deposited multiple gray envelopes with white labels and manila envelopes into the Chantilly Collection Box. HON LAM LUK curled his fingers and had the envelopes in between his knuckles when he deposited the gray envelopes.

57. Additionally, on December 4, 2019, an investigator reviewed the items from the collection box at the Chantilly Post Office. The investigator observed that there were 13 USPS First Class parcels and all of them had the return name of "RAISON EXPRESS." Therefore, I believe that the packages observed by the investigator from the collection box were the envelopes that HON LAM LUK deposited earlier on December 4, 2019.

Surveillance of DUONG THUY NGUYEN

58. On October 30, 2019, investigators observed a gray Nissan Rogue pull alongside the Chantilly Collection Box. Virginia DMV records indicated that the Nissan was registered to an individual believed to be the father of HON LAM LUK at the aforementioned Tabscott Drive residence. DUONG THUY NGUYEN drove the Nissan and there was a child in the back seat. Investigators observed DUONG THUY NGUYEN deposit multiple manila envelopes with white labels and multiple gray envelopes into the Chantilly Collection Box. DUONG THUY NGUYEN curled her fingers and had the envelopes in between her knuckles as she deposited them into the box. I believe that this was an attempt by DUONG THUY NGUYEN to avoid leaving fingerprints on the envelope. Approximately nine hours later, the Nissan Rogue was observed parked in front of the Pennypacker Lane residence.

59. Additionally, on October 30, 2019, a U.S. Postal Inspector reviewed the items from the Chantilly Collection Box. The inspector observed that there were nine USPS First Class parcels and all of them had the return name of "RAISON EXPRESS" and a return address in Fairfax County, Virginia. Four of the parcels were in manila padded envelopes and five of the parcels were in gray padded envelopes. Therefore, I believe that the nine packages observed by USPIS were likely the same envelopes that investigators observed DUONG THUY NGUYEN deposit earlier on October 30, 2019.

60. On November 1, 2019, investigators observed DUONG THUY NGUYEN drive the gray Nissan Rogue and pull alongside the Chantilly Collection Box. DUONG THUY NGUYEN deposited multiple items to include multiple manila envelopes and multiple gray envelopes into the Chantilly Collection Box. DUONG THUY NGUYEN again curled her fingers and had the envelopes in between her knuckles as she deposited some of the items into the box. I believe that this was an attempt by DUONG THUY NGUYEN to avoid leaving fingerprints on the envelope.

61. Additionally, on November 1, 2019, a U.S. Postal Inspector reviewed the items from the collection box at the Chantilly Post Office. The inspector observed that there were 11 USPS First Class parcels and all of them had the return name of "RAISON EXPRESS" and a return address in Fairfax County, Virginia. Nine of the parcels were in manila padded envelopes and two of the parcels were in gray padded envelopes. Therefore, I believe that the 11 packages observed by USPIS were likely the same envelopes that investigators observed DUONG THUY NGUYEN deposit earlier on November 1, 2019.

62. On November 5, 2019, investigators observed DUONG THUY NGUYEN enter the gray Mercedes Benz which was parked at the Hylton Performing Arts Center in Manassas,

Virginia. NGUYEN appeared to have attended a naturalization ceremony at the center and she departed in the vehicle by herself. Investigators believe that DUONG THUY NGUYEN operated the vehicle because HON LAM LUK was out of the country.

63. On November 6, 2019, investigators observed the gray Mercedes Benz pull alongside the Chantilly Collection Box. DUONG THUY NGUYEN drove the Mercedes Benz and there was a child in the back seat. DUONG THUY NGUYEN wore gloves as she deposited multiple gray envelopes into the Chantilly Collection Box. I believe that this was an attempt by DUONG THUY NGUYEN to avoid leaving fingerprints on the envelopes.

64. Additionally, on November 6, 2019, a U.S. Postal Inspector reviewed the items from the Chantilly Collection Box. The inspector observed that there were 12 USPS First Class parcels in gray padded envelopes and all of them had the return name of "RAISON EXPRESS" and a return address in Fairfax County, Virginia. Therefore, I believe that the 12 packages observed by USPIS were likely the same envelopes that investigators observed DUONG THUY NGUYEN deposit earlier on November 6, 2019.

65. On November 15, 2019, investigators observed DUONG THUY NGUYEN driving the gray Mercedes Benz and she pulled alongside the Chantilly Collection Box. DUONG THUY NGUYEN wore a glove on her left hand as she deposited multiple gray envelopes into the Chantilly Collection Box and she guided them into the collection box with her bare right hand closed in a fist. She then deposited multiple manila envelopes with her bare right hand. I believe that this was an attempt by DUONG THUY NGUYEN to avoid leaving fingerprints on the gray envelopes, unlike the manila envelopes which are not suspected of being drug laden packages. DUONG THUY NGUYEN then parked the Mercedes Benz and walked

toward the Post Office. DUONG THUY NGUYEN re-entered the vehicle a few minutes later and departed the area.

66. Additionally, on November 15, 2019, a U.S. Postal Inspector reviewed the items from the collection box at the Chantilly Post Office. The inspector observed that there were nine USPS First Class parcels in gray padded envelopes and all of them had the return name of "RAISON EXPRESS" and a return address in Fairfax County, Virginia. There were three manila envelopes in the collection box where the return name was "DUONG NGUYEN." Therefore, I believe that the 12 packages observed by USPIS were likely the same envelopes that investigators observed DUONG THUY NGUYEN deposit earlier on November 15, 2019.

67. Investigators chose one of the gray padded envelopes from the collection box and several other random parcels from the Chantilly Post Office. The gray padded envelope was addressed to a residence in California and the return name on the envelope was "Raison Express." The parcels were spread out in an area outside of the Chantilly Post Office and a drug detecting K-9 alerted on the gray padded envelope from the Chantilly Collection Box for the presence of narcotics. A search warrant was issued by United States Magistrate Judge Michael Nachmanoff on November 18, 2019. Upon opening the package, investigators observed 30 peach colored tablets in a re-sealable clear plastic baggie which was inside a black foil bag. There was a white piece of paper folded over the black foil bag and the number "30" was written on the paper. It is noted that the contents of the package were similar to those received in all of the undercover purchases from addy4cheap.

68. On November 18, 2019, investigators observed DUONG THUY NGUYEN and a child depart from the Tabscott Drive residence in the gray Mercedes Benz. DUONG THUY NGUYEN carried a blue bag over her shoulder and she pulled a white plastic bag out of the

trunk of the vehicle. There appeared to be manila colored items in the white bag. Approximately eight minutes later, DUONG THUY NGUYEN pulled alongside the Chantilly Collection Box. DUONG THUY NGUYEN wore a glove on her left hand as she deposited multiple manila envelopes into the Chantilly Collection Box and she guided them into the collection box with her bare right hand closed in a fist. Investigators observed DUONG THUY NGUYEN holding the blue bag in her right hand as she deposited some of the manila envelopes.

69. Additionally on November 18, 2019, a U.S. Postal Inspector reviewed USPS records for 10 packages that bore a return name of "RAISON EXPRESS" with a Fairfax County, Virginia return address. These 10 packages had been deposited into the Chantilly Collection Box on November 18, 2019, which is the same Chantilly Collection Box where investigators observed DUONG THUY NGUYEN deposit manila envelopes on November 18, 2019. Therefore, I believe that the 10 packages reviewed by USPIS were likely the same manila envelopes that investigators observed DUONG THUY NGUYEN deposit earlier on November 18, 2019.

70. On November 19, 2019, investigators observed DUONG THUY NGUYEN driving the gray Mercedes Benz and she pulled alongside the Chantilly Collection Box. DUONG THUY NGUYEN wore gloves as she deposited multiple manila envelopes into the Chantilly Collection Box. DUONG THUY NGUYEN then parked and entered the Chantilly Post Office without gloves on her hands.

71. Additionally, on November 19, 2019, a U.S. Postal Inspector reviewed the items from the collection box at the Chantilly Post Office. The inspector observed that there were 10 USPS First Class parcels and all of them had the return name of "RAISON EXPRESS" and a return address in Fairfax County, Virginia. Therefore, I believe that the 10 packages observed by

USPIS were likely the same envelopes that investigators observed DUONG THUY NGUYEN deposit earlier on November 19, 2019.

72. On November 20, 2019, investigators observed DUONG THUY NGUYEN driving the gray Mercedes Benz and she pulled alongside the Chantilly Collection Box. DUONG THUY NGUYEN deposited multiple gray envelopes into the collection box while wearing gloves.

73. Additionally, on November 20, 2019, a U.S. Postal Inspector reviewed the items from the collection box at the Chantilly Post Office. The inspector observed that there were 13 USPS First Class parcels and all of them had the return name of "RAISON EXPRESS" and a return address in Fairfax County, Virginia. Therefore, I believe that the 13 packages observed by USPIS were likely the same envelopes that investigators observed DUONG THUY NGUYEN deposit earlier on November 20, 2019.

74. On November 22, 2019, investigators observed DUONG THUY NGUYEN driving the gray Mercedes Benz and she pulled alongside the Chantilly Collection Box. DUONG THUY NGUYEN wore gloves as she deposited multiple gray envelopes into the Chantilly Collection Box.

75. Additionally, on November 22, 2019, a U.S. Postal Inspector reviewed the items from the collection box at the Chantilly Post Office. The inspector observed that there were 19 USPS First Class parcels and all of them had the return name of "RAISON EXPRESS" and a return address in Fairfax County, Virginia. Therefore, I believe that the 19 packages observed by USPIS were likely the same envelopes that investigators observed DUONG THUY NGUYEN deposit earlier on November 22, 2019.

76. Also on November 22, 2019, United States Magistrate Judge Michael Nachmanoff authorized an extension of the GPS tracking search warrant for the device installed on the gray Mercedes Benz.

77. On November 25, 2019, investigators observed DUONG THUY NGUYEN driving the gray Mercedes Benz and she pulled alongside the Chantilly Collection Box. DUONG THUY NGUYEN wore gloves as she deposited multiple gray and manila envelopes into the Chantilly Collection Box. As DUONG THUY NGUYEN drove away from the Post Office, it was observed that she did not have gloves on her hands any longer.

78. Additionally, on November 25, 2019, a U.S. Postal Inspector reviewed the items from the collection box at the Chantilly Post Office. The inspector observed that there were 19 USPS First Class parcels and all of them had the return name of "RAISON EXPRESS" and a return address in Fairfax County, Virginia. One of the 19 packages was intended for the undercover investigator who had placed an order on November 21, 2019 with addy4cheap as detailed in the table above. Therefore, I believe that the 19 packages observed by USPIS were likely the same envelopes that investigators observed DUONG THUY NGUYEN deposit earlier on November 25, 2019.

79. On December 2, 2019, investigators observed DUONG THUY NGUYEN driving the gray Mercedes Benz with a small child in the back seat as she pulled alongside the Chantilly Collection Box. DUONG THUY NGUYEN wore gloves as she deposited multiple manila envelopes into the Chantilly Collection Box.

80. Additionally, on December 2, 2019, a U.S. Postal Inspector reviewed the items from the collection box at the Chantilly Post Office. The inspector observed that there were 19 USPS First Class parcels and all of them had the return name of "RAISON EXPRESS" and a

return address in Fairfax County, Virginia. Therefore, I believe that the 19 packages observed by USPS were likely the same envelopes that investigators observed DUONG THUY NGUYEN deposit earlier on December 2, 2019.

Video Surveillance and Digital Photographs

81. A video surveillance camera was positioned on the Chantilly Collection Box for a significant portion of the investigation. In addition to the previously detailed deposits made into the Chantilly Collection Box, investigators reviewed video recordings of additional deposits of suspected addy4cheap packages. The white Scion was observed at the Chantilly Collection Box on September 12 and 24, 2019 and the driver deposited multiple envelopes. The gray Mercedes Benz was observed at the Chantilly Collection Box on September 25 and October 15, 25 and 26, 2019 and the driver deposited multiple envelopes. The gray Nissan Rogue was observed at the Chantilly Collection Box on October 29, 2019 and the driver deposited multiple envelopes.

82. It is noted that investigators took digital photos for all of the physical surveillance events detailed in this affidavit except for the surveillance on October 17, 2019.


Conclusion

83. It is noted that all of the aforementioned USPS collection boxes, the Chantilly Post Office, the Pennypacker Lane residence and the Tabscott Drive residence are all within the Eastern District of Virginia.

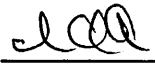
84. I believe that LIEN KIM THI PHAN, HON LAM LUK and DUONG THUY NGUYEN deposited numerous packages containing illegal narcotics in association with the darknet vendor addy4cheap. These individuals repeatedly mailed packages that were identical in many respects to drug laden packages that were obtained through undercover drug purchases. I believe that the defendants took measures to conceal their activity including: (1) mailing

packages that did not have their true names and addresses listed as the return information, (2) utilizing multiple USPS collection boxes on the same day to deposit packages, (3) handling the packages in a manner to avoid leaving fingerprints and (4) operating in the late evening or early morning hours.

85. Based on the foregoing, I submit that there is probable cause to believe that, from on or about August 2019 to on or about December 2019, within the Eastern District of Virginia and elsewhere, LIEN KIM THI PHAN, HON LAM LUK and DUONG THUY NGUYEN did unlawfully, knowingly and intentionally combine, conspire, confederate, and agree with others, both known and unknown, to unlawfully, knowingly, and intentionally distribute 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 846.


Donald August Mockenhaupt
Special Agent
Federal Bureau of Investigation

Subscribed and sworn to before me
on the 6th day of December 2019.

 /s/
Ivan D. Davis
United States Magistrate Judge